

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Angelica Parker,

Plaintiff,

-against-

Scott Bursor, et al.,

Defendants.

24-CV-245 (JGLC) (RFT)

**ORDER**

**ROBYN F. TARNOFSKY, United States Magistrate Judge:**

1. Plaintiff's application to adjourn the hearing scheduled for February 26, 2025 (ECF 280) is DENIED.
2. For the reasons stated at the hearing today, Defendants' cross-motion for discovery (ECF 288) is GRANTED in PART and Plaintiff's motion to quash the subpoena on her counsel (ECF 280) is DENIED in PART as follows: Plaintiff is directed to produce by **5:00pm on February 14, 2025** the following materials: (a) all communications between Plaintiff's counsel (including former counsel Hantman) and Plaintiff regarding the litigation hold and other communication providing clear guidance on the potential consequences of noncompliance; and (b) any chronologies or narratives created by Plaintiff about the events at issue in this law suit that are not listed on her privilege log.
3. To the extent not addressed in this order, Defendants' cross-motion for discovery (ECF 288) and Plaintiff's motion to quash the subpoena on her counsel (ECF 280) is HELD in ABEYANCE pending further submissions consistent with this order.

4. For the reasons stated at the hearing today, Plaintiff is directed to send to Chambers by **5:00pm on February 14, 2025** the following materials for in camera inspection: all communications between Plaintiff's counsel and Plaintiff concerning any request by Plaintiff's counsel that Plaintiff contact Ms. Song.
5. By **February 21, 2025**, the parties shall submit on the docket a joint proposed order containing the following information:
  - a. The full caption of the action;
  - b. The names, addresses (including firm names), telephone numbers, and e-mail addresses of counsel;
  - c. A list of all witnesses, indicating whether such witnesses will testify in person, by video, or by deposition, whether such witnesses will require an interpreter (and, if so, which party will pay the costs for the interpreter), and a brief summary of the substance of each witness's anticipated testimony. Absent leave of Court, a witness listed by both sides shall testify only once, with Plaintiff permitted to go beyond the scope of the direct examination on cross examination, and counsel should confer with respect to scheduling;
  - d. A designation by each party of deposition testimony to be offered by the party, with any cross-designations and objections by any other party. For any deposition with objections, the parties shall also provide the full transcript of that deposition, unless otherwise ordered by the Court; and
  - e. A list by each party of exhibits to be offered by the party. If a party objects to an exhibit, the objection should be noted by indicating the Federal Rule of Evidence

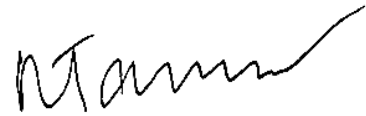
that is the basis for the objection. If any party believes that the Court should rule on such an objection in advance of trial, that party should include a notation to that effect (e.g., “Advance Ruling Requested”) as well.

6. By **February 24, 2025**, the parties shall submit on the docket (i) affidavits—the originals of which shall be marked as exhibits at the hearing— constituting the direct testimony of each witness, except for testimony of an adverse party, a person whose attendance must be compelled by subpoena, a person for whom a party has requested and from whom the Court has agreed to hear direct testimony during the hearing, and witnesses whose testimony will be provided by deposition; and (ii) all deposition excerpts that will be offered as evidence. To the extent that a party wishes to rely at the hearing on previously filed affidavits or declarations, the party need not resubmit those documents on the docket and shall instead provide a citation to the docket number.
7. All exhibits must be pre-marked in advance of the hearing. By **February 24, 2025**, each party shall submit to Chambers a flash drive containing electronic copies of all documentary exhibits organized by exhibit number and a document listing all exhibits sought to be admitted. The list of all exhibits sought to be admitted shall be separated into four columns labeled: (1) Exhibit Number; (2) Description of the exhibit; and (3) Admitted/Not Admitted.

8. By **March 3, 2025**, each party shall submit on the docket proposed findings of fact and conclusions of law—a copy of which shall be e-mailed to Chambers in .pdf version—which, for each proposed factual finding, shall include citations to the record.

DATED: February 13, 2025  
New York, NY

SO ORDERED.

A handwritten signature in black ink, appearing to read 'RTarnofsky', written over a horizontal line.

**ROBYN F. TARNOFSKY**  
United States Magistrate Judge